



Alabama Department of Environmental Management
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1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

March 15, 2021

Caroline Y. Freeman, Director
Air and Radiation Division
U.S. EPA, Region 4 Office
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 30303

Dear Ms. Freeman,

On November 22, 2010, the U.S. EPA designated a portion of Pike County, Alabama, as nonattainment for the 2008 Pb NAAQS. This area included a portion of Pike County within a radius of 0.8 miles of the Sanders Lead Company. Upon meeting the standard after the required three-year monitoring period, Alabama submitted a request on January 3, 2018, to redesignate the Troy area to attainment. The area was formally redesignated to attainment on June 20, 2018 (83 FR 28543). Subsequent to redesignation to attainment, an upset condition occurred at the facility on November 11, 2019. The ambient lead level from the one-day incident led to an exceedance of the 3-year ambient lead standard.

Section 175A(d) of the Clean Air Act Amendments (CAAA) requires the inclusion of contingency provisions in the maintenance plan that would be implemented by the state to correct any future violation(s) of the NAAQS in areas that had been redesignated to attainment. Since the Sanders Lead facility is the only significant source of lead emissions in the Troy area, the approach used for the maintenance plan to demonstrate that attainment of the lead standard will continue to be maintained was based upon the enforceable control measures in place for the Sanders Lead facility.

On November 11, 2019, the electrical supply provided by the City of Troy, Alabama, to the Sanders Lead facility was interrupted for approximately two hours due to a blown fuse inside the city's power supply system, which resulted in uncontrolled emissions escaping the facility. Subsequently, elevated ambient lead emissions were measured at the Pb ambient air monitor operated by ADEM. These elevated ambient lead levels led to the October 2019-December 2019 and November 2019-January 2020 three-month rolling averages exceeding the 2008 lead NAAQS of 0.15 $\mu\text{g}/\text{m}^3$.



In an effort to prevent a reoccurrence of this event in the future, the City of Troy has agreed to reconfigure its electrical system to provide the Sanders Lead facility with additional substations, which would restore power to the facility within 5 seconds of a future power outage such as the one that occurred on November 11, 2019 (see attached agreement). This reconfiguration will also be included as a permit condition in Sanders Lead's revised Title V permit.

The State of Alabama hereby requests that this letter and associated attachments serve as evidence of the mitigation actions that will be required of Sanders Lead to ensure that a reoccurrence of the event which led to the exceedance of the 2008 lead NAAQS is prevented in the future, and that this letter and associated attachments be considered adequate for meeting the requirements of the Redesignation and Maintenance Demonstration for the Troy Pb Nonattainment Area and the CAA.

If you have any questions or require further information, please contact Larry Brown at 334-271-7878.

Sincerely,

A handwritten signature in black ink that reads "Ronald W. Gore". The signature is written in a cursive style with a large, stylized "R" and "G".

Ronald W. Gore, Chief
Air Division

RWG/LB/le:bdc

Enclosures

cc: Tiereny Bell
Lynorae Benjamin
Todd Rinck
Jane Spann
Gregg Worley